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**MAY 10 2016**

U.S. DISTRICT COURT  
EASTERN MICHIGAN

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CASE NO. 15-20503

Plaintiff,

HON. GERSHWIN A. DRAIN

v.

VIOLATIONS: 18 U.S.C. §§ 875(b),  
1001(a), 1015(e), 1028A; 8 U.S.C. §  
1325(a)

D-1 ALEXANDER MURRELL,

Defendant.

**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES

**COUNT ONE**

(False Claim of United States Citizenship – 18 U.S.C. § 1015(e))

D-1 ALEXANDER MURRELL

On or about July 5, 2015, in the Eastern District of Michigan, Southern Division, defendant, ALEXANDER MURRELL, did knowingly make a false statement and claim that he was a citizen of the United States, with the intent to obtain, on behalf of himself, a Federal benefit, namely admission into the United States, in violation of Title 18, United States Code, Section 1015(e).

**COUNT TWO**

(False Statement – 18 U.S.C. § 1001(a))

On or about July 5, 2015, in the Eastern District of Michigan, Southern Division, defendant, ALEXANDER MURRELL, in a matter within the jurisdiction of the executive branch of the Government of the United States, namely the Department of Homeland Security, knowingly and willfully made a materially false, fictitious and fraudulent statement and representation to an officer and agent of the United States Custom and Border Patrol, namely that the defendant, ALEXANDER MURRELL, stated that he was as a citizen of the United States, all in violation of Title 18, United States Code, Section 1001(a).

**COUNT THREE**

(Improper Entry By Alien – 8 U.S.C. § 1325(a))

On or about July 5, 2015, in the Eastern District of Michigan, Southern Division, defendant, ALEXANDER MURRELL, an alien, did knowingly enter and attempt to enter the United States at a place other than as designated by immigration officers, in violation of Title 8, United States Code, Section 1325(a).

**COUNT FOUR**

(Aggravated Identity Theft – 18 U.S.C. § 1028A)

On or about July 5, 2015, in the Eastern District of Michigan, South Division, defendant, ALEXANDER MURRELL, during and in relation to a felony violation, namely, false statements, in violation of Title 18, United States Code, Section 1001, did knowingly possess and use, without lawful authority, a means of identification of another person, specifically the full name and date of birth of a member of the United States Army who had been killed in action, all of which is a violation of Title 18, United States Code, Section 1028A.

**COUNT FIVE**

(Extortion by Interstate and Foreign Communication – 18 U.S.C. § 875(b))

From in or about October, 2014, to December, 2014, while in Canada, the defendant, ALEXANDER MURRELL, knowingly and with the intent to extort from a person a thing of value, namely a sexual relationship, did transmit in interstate and foreign commerce communications containing a threat to injure the person of another, namely emails sent from Canada to California, stating:

“I know where you live, you live on [redacted] . . . you better stick with your words or you’re dead!”

“I want you to worry everyday wondering when I might be, coming for you.”

“And yes I will kill you!”

“I’ll tell you what I’m going to do once you pull into your parking garage. I’m going to approach your car I will smash your driver side window and I will shoot you in the head. I am carrying a (loaded weapon) I am ready to use it at any time.”

In violation of Title 18, United States Code, Section 875(b).

BARBARA MCQUADE  
United States Attorney

Gary Felder  
Gary Felder  
Assistant United States Attorney  
Deputy Chief, National Security Unit

Michael C. Martin  
Michael C. Martin  
Assistant United States Attorney

Dated: May 10, 2016

|  |                           |                         |
|--|---------------------------|-------------------------|
| United States District Court<br>Eastern District of Michigan | Criminal Case Cover Sheet | Case Number<br>15-20503 |
|--|---------------------------|-------------------------|

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

**Reassignment/Recusal Information** This matter was opened in the USAO prior to August 15, 2008 [ ]

|  |  |                              |
|--|--|------------------------------|
| <b>Companion Case Information</b>  |  | Companion Case Number:       |
| This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> : |  | Judge Assigned:              |
| <input type="checkbox"/> Yes <input type="checkbox"/> No                 |  | AUSA's Initials: <u>MCAM</u> |

**Case Title:** USA v. ALEXANDER MURRELL

**County where offense occurred :** Wayne

**Check One:**  **Felony**       **Misdemeanor**

Indictment/  Information --- no prior complaint.

Indictment/  Information --- based upon prior complaint [Case number: ]

Indictment/  Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: 15-20503      Judge: Gershwin A. Drain

- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

| <b>Defendant name</b> | <b>Charges</b>  | <b>Prior Complaint (if applicable)</b> |
|-----------------------|---|--|
| Alexander Murrell     | 18 U.S.C. § 875(b), 1001<br>(a), 1015(e), 1028(a); 8 U.S.C. § 1325(a) | 15-mj-30328                            |

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

May 10, 2016  
Date



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Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.